

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JOON BANG, RAZVAN VICTOR  
BENGULESCU, GERALD BEZEMS,  
SCOTT CROCKETT, RIFAT  
GORENER, CHRISTOPHER LESIEUR,  
LAWRENCE MARCUS, and MIKHAIL  
SULEYMANOV, individually and on  
behalf of others similarly situated,

Plaintiffs,

vs.

BMW OF NORTH AMERICA, LLC,  
BAVARIAN MOTOR WORKS, and  
DOES 1 through 10, inclusive,

Defendants.

No. 2:15-cv-6945 (MCA)(LDW)

**CLASS ACTION**

**DECLARATION OF MATTHEW D. SCHELKOPF IN SUPPORT OF  
PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

I, Matthew D. Schelkopf, declare as follows:

1. I am a member of the law firm of McCune Wright Arevalo, LLP, and proposed Settlement Class Counsel for Plaintiffs in the above-captioned action. I am admitted to practice before the Supreme Courts of Pennsylvania and New Jersey. I submit this Declaration in Support of Plaintiffs' Motion for Preliminary Approval of the Class Action Settlement.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Settlement Agreement in this Action.
3. Attached hereto as **Exhibit 1-A** is true and correct copy of the Claim Form.
4. Attached hereto as **Exhibit 1-B** is a true and correct copy of the Notice.
5. Attached hereto as **Exhibit 1-C** is a true and correct copy of the proposed Preliminary Approval Order.
6. Attached hereto as **Exhibit 2** is a true and correct copy of the firm resume of proposed Settlement Class Counsel McCune Wright Arevalo, LLP.
7. Attached hereto as **Exhibit 3** is a true and correct copy of the firm resume of proposed Settlement Class Counsel Wagstaff & Cartmell LLP.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 4, 2018

Respectfully submitted,

By: /s/ Matthew D. Schelkopf  
Matthew D. Schelkopf  
Joseph B. Kenney  
**McCUNE WRIGHT AREVALO, LLP**  
555 Lancaster Avenue  
Berwyn, PA 19312  
Telephone: (610) 200-0581  
mds@mccunewright.com  
jbk@mccunewright.com

**CERTIFICATE OF SERVICE**

I, Matthew D. Schelkopf, certify that I caused the foregoing to be electronically filed in this case on May 4, 2018, using the Court's CM/ECF System, thereby serving it upon all counsel of record in this case.

*/s/ Matthew D. Schelkopf*  
Matthew D. Schelkopf